

EXHIBIT 75

In the Matter Of:

HENRY v

BROWN UNIVERSITY

SARAH DONAHUE

March 26, 2024



1 A. I can't remember the details. It was an
2 effort to have schools sign on to the same need
3 analysis methodology.

4 Q. And can you recall analyzing the issue on
5 behalf of Harvard whether to be part of the
6 568 Group?

7 A. Yes, we did analyze what it would mean for
8 our program. It was why we didn't join the group.

9 Q. And can you recall why it was that Harvard
10 decided not to join the group?

11 A. Because if we used the consensus
12 methodology as it was at the time, we would have
13 to withdraw -- I mean, we would not be able to
14 award the financial aid we had awarded to
15 families. We'd have to reduce it. And that was
16 counter to our goals of keeping Harvard
17 affordable.

18 Q. I think you said you attended 568 Group
19 meetings after the fall of 2000. Is that right?

20 A. Yes.

21 Q. Do you recall over what period of time you
22 attended such meetings?

23 A. I don't recall specifically. I don't even
24 recall specifically when the 568 Group consensus